

Stephen C. Hilbert, Vol. II

Sands v. Menard

December 3, 2010

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<p>1 A It is.</p> <p>2 Q And approximately how many times did they -- did</p> <p>3 they visit you there?</p> <p>4 A Oh, I couldn't tell you the exact amount of</p> <p>5 time, but several.</p> <p>6 Q During the -- your relationship was close for</p> <p>7 roughly three years, I think you've said?</p> <p>8 A Yes. Multiple times during that three-year</p> <p>9 period.</p> <p>10 Q Like once or twice a year?</p> <p>11 A Yes.</p> <p>12 Q And what is the -- is this a brochure that you</p> <p>13 caused to be prepared?</p> <p>14 A It is.</p> <p>15 Q And was there a reason for this?</p> <p>16 A Yeah, because we -- we -- we rent the home when</p> <p>17 we aren't there. We only spend five weeks or so</p> <p>18 a year there.</p> <p>19 Q So this is like a brochure to attract renters?</p> <p>20 A It is. We actually have the home for sale right</p> <p>21 now, but -- so there's actually a better</p> <p>22 brochure, if you're interested.</p> <p>23 Q What's -- what's the asking price?</p> <p>24 A \$29 million. Cheap at twice the price.</p> <p>25 Q You're out of my price range.</p>	<p>1 A This hangs in --</p> <p>2 Q -- with -- with --</p> <p>3 A This -- this hangs in the bar of Mar-a-Lago.</p> <p>4 Q Okay. And that is the place where Deb and John</p> <p>5 came to visit you in Florida in December 2003?</p> <p>6 A That is right.</p> <p>7 Q I -- are you aware that Mr. Menard harbored</p> <p>8 any -- or harbors any suspicions about the</p> <p>9 propriety of your relationship with Ms. Sands?</p> <p>10 MR. FREEBORN: Object to form.</p> <p>11 A Not to my knowledge.</p> <p>12 Q Okay. I want to read you some deposition</p> <p>13 testimony. Again, this is at page 109, line --</p> <p>14 I'm going to start at line 14. And the question</p> <p>15 quotes from a document that you sent, which</p> <p>16 we'll get to later.</p> <p>17 It says, "Question: He says, 'Deb, as I've</p> <p>18 said more than once, your dedication and</p> <p>19 attention to detail in pro- -- in protecting</p> <p>20 John while at the same time being fair is deeply</p> <p>21 appreciated and admired.'</p> <p>22 "Question:" And then I -- "Did you think</p> <p>23 she was protecting you?</p> <p>24 "MR. NORTON: Object to the form, asked and</p> <p>25 answered.</p>
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<p>1 You also mentioned that -- that when</p> <p>2 you're -- that the event that -- apart from the</p> <p>3 lunch that got your relationship kind of off and</p> <p>4 running when it led into business was when you</p> <p>5 went to Florida to, I think you said, the home</p> <p>6 of your dear friend Donald Trump; correct?</p> <p>7 A I'm not sure I said dear friend, but to Trump's</p> <p>8 home, yes. He is a dear friend. But yes.</p> <p>9 Q Okay. Let me show --</p> <p>10 MR. SHULMAN: Let me ask the reporter to</p> <p>11 mark as Exhibit 604 this document, which is a</p> <p>12 copy of a photograph.</p> <p>13 MR. KEMPF: It's a picture show. Great.</p> <p>14 (Plaintiff's Deposition Exhibit(s) 604 was</p> <p>15 marked for identification.)</p> <p>16 BY MR. SHULMAN:</p> <p>17 Q Do you recognize Exhibit 604?</p> <p>18 A I -- I do.</p> <p>19 Q And can you tell us what it is?</p> <p>20 A It's Donald's favorite photo.</p> <p>21 Q Is this a portrait or a --</p> <p>22 A It's a -- it's a portrait.</p> <p>23 Q Okay. And is this a portrait of Mr. Trump that</p> <p>24 hangs in his -- in the Florida residence where</p> <p>25 you --</p>	<p>1 "Mr. Menard" -- or "Answer: Protecting me</p> <p>2 from what?</p> <p>3 "Question: Protecting you in the deal,</p> <p>4 looking out for your interests.</p> <p>5 "Answer: At the time or now?</p> <p>6 "Question: Let's say at the time.</p> <p>7 "Answer: At the time, yeah. Now, I don't</p> <p>8 think so.</p> <p>9 "Question: Why not?</p> <p>10 "Answer: Because a lot more has come to</p> <p>11 light about the relationship between Steve and</p> <p>12 Deb and --</p> <p>13 "Question: What's come to light?</p> <p>14 "Answer: What's come to light?</p> <p>15 "Question. Yeah. That you didn't know</p> <p>16 about, that relationship.</p> <p>17 "Answer: Well, the fact that she was</p> <p>18 trying to convince me to do the deal at the same</p> <p>19 time she was taking money from Steve. And, you</p> <p>20 know, she worked both ends of that deal on -- on</p> <p>21 these with this Steve guy. Okay. I mean,</p> <p>22 there's --</p> <p>23 "Question: Have you talked to him about</p> <p>24 this?</p> <p>25 "Answer: No.</p>